


Exhibit 4

2

CIVIL ACTION COVER SHEET		DOCKET NO(S) B.L.S. 19-3714	Trial Court of Massachusetts Superior Court Department County: SUFFOLK
PLAINTIFF(S): BRANDA PEEBLES and JOSHUA BERGER, INDIVIDUALLY, AND ON BEHALF OF ALL OTHERS SIMILARLY SITUATED		DEFENDANT(S): JRK PROPERTY HOLDINGS, INC.; STEVENS POND APARTMENTS PROPERTY OWNER, LLC, and ONE WEBSTER APARTMENTS PROPERTY OWNER LLC	
ATTORNEY, FIRM NAME, ADDRESS AND TELEPHONE Board of Bar Overseers number KEITH L. SACHS (BBO# 634025), D. SCOTT DULLEA (BBO #670416), DDSK LAW LLC, 900 CUMMINGS CENTER, SUITE 210U BEVERLY, MA 01915 (978) 338-6620		ATTORNEY (if known) <div style="border: 1px solid black; padding: 5px; text-align: center;">SUFFOLK SUPERIOR COURT CIVIL CLERK'S OFFICE FILED NOV 25 2019 MICHAEL JOSEPH DONOVAN CLERK OF COURT</div>	
Origin Code Original Complaint			
N/A			
CODE NO.	TYPE OF ACTION (specify)	TRACK	IS THIS A JURY CASE? *
BK.1	Complex Consumer Class matter	(B)	(x) Yes () No
The following is a full and detailed statement of the facts on which plaintiff relies to determine eligibility into The Business Litigation Session.			
<p>This action involves the Defendant's systemic use of an unlawful lease provision in order to force its tenants to incur costs for remedying "reasonable wear and tear" for which the tenants are not responsible under the law. In addition to the unlawful lease provisions, the Defendant systemically and unlawfully retains the security deposit monies or portions thereof of its tenants in order to remedy "reasonable wear and tear" in violation of Massachusetts law. Such practices are in violation of the Massachusetts Security Deposit Statute, G.L. c. 186, § 15B, <i>et seq.</i>, and the Massachusetts Consumer Protection Statute, G.L. c. 93A.</p> <p>The Defendants' violations of law have occurred on a class-wide basis and the instant action seeks relief for the named Plaintiff as well as the putative class of Similarly Situated Individuals who have suffered the same injury as a result of the Defendant's conduct as further described herein and who are entitled to relief pursuant to G. L. c. 93A, § 9(2). The Business Litigation Session is the ideal venue for the quick and efficient adjudication of complex consumer protection class actions such as the case at bar.</p>			
* A Special Tracking Order shall be created by the Presiding Justice of the Business Litigation Session at the Rule 16 Conference.			
PLEASE IDENTIFY, BY CASE NUMBER, NAME AND COUNTY, ANY RELATED ACTION PENDING IN THE SUPERIOR COURT DEPARTMENT.			
N/A			
"I hereby certify that I have complied with the requirements of Rule 5 of the Supreme Judicial Court Uniform Rules on Dispute Resolution (SJC Rule 1:18) requiring that I provide my clients with information about court-connected dispute resolution services and discuss with them the advantages and disadvantages of the various methods." Signature of Attorney of Record			
		DATE: 11/13/19	

NOTICE TO ATTORNEY GENERAL OF COMPLAINT ON CHAPTER 93A ACTION	DOCKET NUMBER 1984CV03714	Trial Court of Massachusetts The Superior Court 
CASE NAME: Peebles, Branda vs. JRK Property Holdings Inc		Michael Joseph Donovan, Clerk of Court
Attorney General Consumer Protection Division One Ashburton Place Boston, MA 02108-1698		COURT NAME & ADDRESS
<p>Pursuant to G.L. c. 93A, § 10, enclosed is a copy of the complaint seeking relief under G.L. c. 93A. The action was filed in this court on 11/25/2019.</p>		
DATE 12/06/2019	CLERK OF COURTS Michael Joseph Donovan, Clerk of Court	

**Commonwealth of Massachusetts
County of Suffolk
The Superior Court**

CIVIL DOCKET#: **SUCV2019-03714-BLS1**

Case: Peebles et al. v. JRK Property Holdings, Inc. et al.

Notice sent
12/09/2019
K. L. S.
DDSK LAW., LLC.
D. S. D.

(sc)

NOTICE OF ACCEPTANCE INTO BUSINESS LITIGATION SESSION

This matter has been accepted into the Suffolk Business Litigation Session. It has been assigned to **BLS1**.

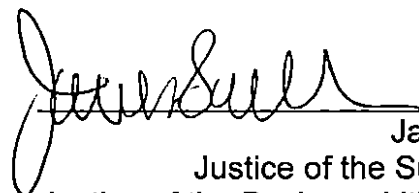
Hereafter, as shown above, all parties must include the initials "BLS1" at the end of the docket number on all filings.

Counsel for the plaintiff(s) is hereby advised that within seven (7) days of the filing of an appearance, answer, motion or other response to the complaint by or on behalf of the defendant(s) which has been served with process within the time limitation of Mass. R. Civ. P. 4(j), or such other time as may be modified by the Court, he or she shall send notice thereof to the appropriate BLS Session Clerk at Suffolk Superior Court, Three Pemberton Square, Boston, MA 02108.

Upon receipt of such notice, the Court will issue a Notice of Initial Rule 16 Conference for purposes of meeting with all counsel. Before the Rule 16 Conference, counsel shall discuss with their clients and with opposing counsel whether the parties will participate in the BLS Project on Discovery (counsel are directed to <http://www.mass.gov/courts/court-info/trial-court/sc/sc-bls-gen.html> for description of the Project). Counsel may indicate their respective client's participation by completing, filing and serving the attached form. If by the date of the initial Rule 16 Conference, not all parties have given notice of their participation, counsel shall be prepared to discuss at that conference whether their clients will participate in the Project.

The Court requests that plaintiff's counsel serve on opposing parties a copy of this notice and the attached form.

Dated: 12/24/19



Janet L. Sanders
Justice of the Superior Court &
Administrative Justice of the Business Litigation Session

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COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT
BUS. LIT. SESSION
CIVIL ACTION NO. 19-3714

BRANDA PEEBLES and JOSHUA
BERGER, Individually, and on BEHALF
OF ALL OTHERS
SIMILARLY SITUATED,
Plaintiffs,

vs.

JRK PROPERTY HOLDINGS, INC.,
STEVENS POND APARTMENTS
PROPERTY OWNER, LLC, and ONE
WEBSTER APARTMENTS
PROPERTY OWNER, LLC,
Defendants.

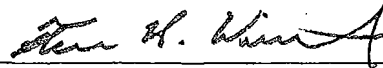
SUFFOLK SUPERIOR COURT
CIVIL PLEAS OFFICE
2020 JAN 21 PM 3:06
MICHAEL J. JOHNSON
CLERK / MAGISTRATE

AFFIDAVIT OF ACCEPTANCE OF SERVICE BY THOMAS WINTNER, ESQ.

I, Thomas Wintner, Esq., on oath do depose and state as follows:

1. I am over the age of eighteen and have personal knowledge of the facts contained herein.
2. I am counsel for the defendants, JRK PROPERTY HOLDINGS, INC., STEVENS POND APARTMENTS, PROPERTY OWNER, LLC, and ONE WEBSTER APARTMENTS PROPERTY OWNER, LLC.
3. I am in receipt of the above-named Plaintiffs' Complaint.
4. On behalf of the Defendants, I have accepted service of the Plaintiffs' Complaint as of January 7, 2020.
5. By agreement with counsel, the date by which the Defendants shall file a responsive pleading to the Plaintiffs' Complaint is February 28, 2020.

Signed under the pains and penalties of perjury this 9th day of January 2020.


Thomas Wintner, Esq.

Notify

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

**SUPERIOR COURT
Civil No. 19-3714-BLS1**

**BRANDA PEEBLES, et al.
Plaintiffs**


vs.

**JRK PROPERTY HOLDINGS, INC., et al.
Defendants**

SCHEDULING ORDER

From the docket, it appears that the Court has never seen the parties on this matter, and that there has been no action on the docket since defendants filed an answer before the COVID-19 pandemic. Accordingly, the Court shall conduct a status conference in this case over Zoom on June 17, 2022, at 3:00 p.m. to determine what remains to be done and to set a schedule for resolving the case. The parties shall confer in advance about a mutually agreeable schedule.

Dated: June 2, 2022


Peter B. Krupp
Justice of the Superior Court

NOTICE SENT (2)
06-08-22 DC

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VM

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT
BUS. LIT. SESSION
CIVIL ACTION NO.
SUCV1984-03714-BLS1

BRANDA PEEBLES and JOSHUA
BERGER, Individually, and on BEHALF
OF ALL OTHERS SIMILARLY
SITUATED,
Plaintiffs,

v.

JRK PROPERTY HOLDINGS, INC.,
STEVENS POND APARTMENTS
PROPERTY OWNER, LLC, and ONE
WEBSTER APARTMENTS
PROPERTY OWNER, LLC,
Defendants.

JOINT CASE MANAGEMENT STATEMENT AND PROPOSED SCHEDULE

To provide the Court with some background in advance of the Zoom Status Conference set for June 17, 2022 in the above-captioned action, the parties jointly state as follows:

1. The parties met and conferred on June 9, 2022, to discuss the status update requested by the Court.
2. Both parties have served written requests for production of documents, and both parties have produced documents responsive to the same. Both parties are currently in the process of supplementing their productions.
3. Defendants have served written interrogatories, and the plaintiffs have responded to the same.

4. Plaintiffs anticipate they will serve further written discovery. Plaintiffs also anticipate taking one or two depositions in this matter.

5. Defendants will determine whether depositions are necessary after receiving Plaintiffs' supplemented and complete responses to Defendants' written discovery requests.

6. Undersigned counsel have preliminarily discussed mediating this action.

7. In view of the above, the parties propose the following schedule:

Stage of Litigation	Deadline
Fact discovery and depositions completed	December 30, 2022
Expert disclosures served	January 6, 2023
Expert discovery and depositions completed	March 1, 2023
All motions under MRCP 56 and MRCP 23 served	March 1, 2023
All motions under MRCP 56 and MRCP 23 filed	March 31, 2023
Final pretrial conference	To be determined by Court
Trial	To be determined by Court

The parties do not believe that any other issues need to be discussed at the Zoom Status Conference, but will be ready to discuss additional issues raised by the Court.

Respectfully submitted,
BRANDA PEEBLES and JOSHUA
BERGER, et al.
By their attorneys,

/s/ Keith L. Sachs

Keith Sachs (BBO #634025)
D. Scott Dullea (BBO #670416)
DDSK Law LLC
900 Cummings Center, Suite 210(u)
Beverly, MA 01915
978-338-6620
ksachs@ddsklaw.com

JRK PROPERTY HOLDINGS, INC.,
STEVENS POND APARTMENTS
PROPERTY OWNER, LLC, and ONE
WEBSTER APARTMENTS PROPERTY
OWNER, LLC,

By their attorneys,

/s/ *Thomas H. Wintner*

Thomas H. Wintner (BBO # 667329)
Mathilda S. McGee-Tubb (BBO # 687434)
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GLOVSKY, AND POPEO, P.C.
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twintner@mintz.com
msmcgee-tubb@mintz.com

CERTIFICATE OF SERVICE

A copy of the foregoing was filed electronically this date. Notice of the filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Dated: June 16, 2022

/s/ *Keith L. Sachs*

NOTIFY

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COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT
Civil No. 19-3714-BLS1

BRANDA PEEBLES, et al.
Plaintiffs

vs.

JRK PROPERTY HOLDINGS, INC., et al.
Defendants

SCHEDULING ORDER

This case came before me today for a status conference. After consulting with counsel about a reasonable schedule and reviewing the parties' joint case management statement and proposed schedule, it is hereby ORDERED as follows:

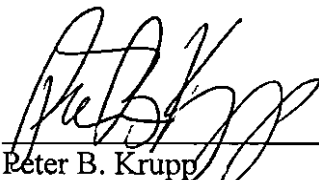
Fact discovery, including depositions, shall be completed by December 30, 2022.

The parties shall make their expert disclosures by January 6, 2023. Expert discovery and depositions shall be completed by March 1, 2023.

Any motions under Mass. R. Civ. P. 23 and 56 shall be served by March 1, 2023, and filed in compliance with Superior Court Rule 9A by March 31, 2023.

The court shall conduct a further status conference on November 29, 2022, at 2 PM, to set dates for resolving this matter.

Dated: June 17, 2022


Peter B. Krupp
Justice of the Superior Court

NOTICE SENT (2)
06.27.22 (sc)

3. On November 7, 2022, the Court issued a Notice of a Conference to Review Status for December 6, 2022.
4. Counsel for Defendants are available on November 29, but are not available on December 6. Attorney Wintner is currently scheduled to be on trial in Texas, and Attorney McGee-Tubb is scheduled to be out of the country for a client matter.
5. Counsel for Defendants have conferred with counsel for Plaintiffs, and counsel for all parties are available on December 13 or 14, 2022, for a status conference with the Court.
6. Counsel for Plaintiffs assents to this request to continue the status conference.

WHEREFORE, Defendants respectfully request that the Court continue the December 6, 2022 Status Conference to December 13 or 14, 2022, or to such other date that is convenient for the Court.

Respectfully submitted,

JRK PROPERTY HOLDINGS, INC.,
STEVENS POND APARTMENTS
PROPERTY OWNER, LLC, and ONE
WEBSTER APARTMENTS PROPERTY
OWNER, LLC,

By their attorneys,

/s/ Mathilda S. McGee-Tubb
Thomas H. Wintner (BBO # 667329)
Mathilda S. McGee-Tubb (BBO # 687434)
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msmcgee-tubb@mintz.com

Dated: November 21, 2022

CERTIFICATE OF SERVICE

I, Mathilda S. McGee-Tubb, attorney for the Defendants, hereby certify that on November 21, 2022, I caused a true and accurate copy of the foregoing document to be served by first-class mail and electronic mail on all counsel of record.

/s/ Mathilda S. McGee-Tubb
Mathilda S. McGee-Tubb

NOTIFY

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT
BUS. LIT. SESSION NO. 1

BRANDA PEEBLES and JOSHUA BERGER,
Individually and on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

JRK PROPERTY HOLDINGS, INC., STEVENS
POND APARTMENTS PROPERTY OWNER,
LLC, and ONE WEBSTER APARTMENTS
PROPERTY OWNER, LLC,

Defendants.

Civil Action No. 1984-cv-03714

Notice sent
12/12/22
(2) DC

ASSENTED-TO MOTION TO CONTINUE STATUS CONFERENCE

Defendants JRK Property Holdings, Inc. ("JRK"), Stevens Pond Apartments Property Owner, LLC, and One Webster Apartments Property Owner, LLC (collectively, "Defendants"), respectfully submit this Assented-to Motion to Continue the status conference scheduled for December 6, 2022. Plaintiffs Branda Peebles and Joshua Berger ("Plaintiffs") assent to this Motion. As grounds therefore, Defendants state as follows:

1. On June 17, 2022, the Court entered a Scheduling Order, providing in relevant part that fact discovery shall be completed by December 30, 2022, and the Court would conduct a further status conference on November 29, 2022.
2. On June 23, 2022, the Court issued a Notice of a Conference to Review Status for November 29, 2022.

12-722 Allowed. The clerk shall schedule a conference for December 13 or 14. H. Karajian J.